

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

ARTISAN MANUFACTURING  
CORPORATION,

Plaintiff,

V.

ALL GRANITE & MARBLE  
CORPORATION,

Defendant.

07-cv-11278 (WHP)

DECLARATION OF ROBERT DEJA IN SUPPORT OF DEFENDANT'S  
OPPOSITION TO PLAINTIFF'S MOTION FOR A PRELIMINARY INJUNCTION

I, Robert Deja, do hereby state as follows:

1. I am a general manager of All Granite & Marble Corporation, and have held this position since 2001.
2. All Granite & Marble is a well-known fabricator of marble and granite products, and in particular specializes in granite countertops. It has three locations in New Jersey and Pennsylvania, where it has experienced tremendous success and has become known as one of the leaders of the granite countertop industry.
3. All Granite & Marble extensively advertises online, in trade publications, home mailings, television, billboards and others. In 2007 alone, All Granite & Marble spent nearly two and a half million dollars (\$2,500,000) on advertising.
4. All Granite & Marble's internet site, [www.marble.com](http://www.marble.com), has also experienced tremendous success, generating a great number of user hits. Attached as Exhibit A to this Declaration is a survey with Alexa® software, comparing the internet site hits for All Granite & Marble and four sink distributors: Kohler, Elkay USA,

Franke, and Artisan. As can be seen, Artisan has by far the least successful internet site, in terms of number of hits.

5. All Granite & Marble prides itself on its high-quality services and products, and takes great efforts to ensure that the customer is always satisfied with his or her purchase.
6. All Granite & Marble's products are of high quality, as evidenced by the fact that it has never received a single complaint about the quality of its sinks or of any other products. The only complaints that All Granite & Marble has received relate to the actual installation of the products and not the products themselves. All Granite & Marble makes a conscious effort to resolve such complaints quickly and without hassle.
7. I have been made aware of an alleged complaint by a former All Granite & Marble customer, Ms. Alice Anderson. Ms. Anderson purchased a granite countertop installation and was provided a free sink with her purchase. Ms. Anderson has not contacted All Granite & Marble to complain about the products that were installed in her house or to complain about the installation as a whole.
8. The cost of a granite countertop installation is typically about \$2,000 to over \$5,000 for materials and installation.
9. All Granite & Marble does not sell sinks to its customers, in fact, sinks are given to customers for free through use of a "free sink" coupon. Attached as Exhibit B is a sample of an advertisement for All Granite & Marble, which includes a "free sink" coupon at the bottom. The "free sink" coupons only state "ALL SINKS FREE" and state that the coupon has "no monetary value" and is "valid only with sink installation".
10. In instances where the customer does not have such a coupon, the sales representative will generally inform the customer that he or she may get the coupon for a free sink. On occasions where customers had been seeking sink

accessories, All Granite & Marble may direct the customer to other manufacturers, including stores like the Home Depot.

11. Such practice of providing free sinks to customers with the purchase of a granite countertop is quite common in the industry, as granite countertop distributors do not consider the sale of sinks important to their business. Attached as Exhibit C are three advertisements from competitors who provide similar “free sink” coupons to customers.
12. Sinks are a considered an extremely minimal part, if at all, of All Granite & Marble’s business. It makes no profits off of the sinks, and considers sinks as minimal as bottles of granite cleaner, which it also gives to customers for free.
13. At this point, millions of “free sink” coupons have been distributed to potential customers through trade magazines and home mailers.
14. All Granite & Marble has a particular process for handling the sale of granite countertop to a potential customer. When a potential customer enters one of All Granite & Marble’s showrooms, the customer is engaged by a sales representative. The customer and the representative discuss what the customer is looking for in a countertop. After the two discuss the needs of the customer, the customer visits the granite display area with a sales representative, where the customer can look at literally hundreds of styles of granite countertops.
15. This process includes a review by the customer of stone samples. Such review typically takes from twenty minutes to several hours, since customers are extremely keen on selecting desired colors, particularly in view of the anticipated level of expenditure. Further, All Granite & Marble offers over 1,000 different colors and styles from which the customer may select, which obviously lengthens the process.
16. Each of All Granite & Marble’s locations has either a stoneyard or warehouse on site, which generally contains thousands of stone slabs on site. Based on the samples in the showroom, the customer selects one or more stone colors or styles

that he or she may be interested in for installation. To better appreciate the appearance of the selected stone, the customer is walked through a stoneyard or warehouse to see full-size slabs of the selected stones, where the customer typically selects several samples to take with him or her.

17. Based upon the samples of stone that the customer has selected, the sales representative prepares a price quote for the customer. The customer is welcome to take the price quote and samples with him or her after the process is complete.
18. Once the customer selects the specific stone for the installation, various add-ons are discussed, such as countertop removal and the installation of a sink. Where a customer is not installing a sink that has been separately purchased (i.e., not acquired from All Granite & Marble), a customer is notified that a sink may be obtained for free from All Granite & Marble.
19. The representative may explain to the customer that there are three basic styles of stainless steel sinks offered by All Granite & Marble: rectangular, D-shaped, and double bowl. The customer may present a "free sink" coupon, and the customer will receive a free sink. In fact, in instances where the customer does not have a coupon, the sales representative may either inform the customer of the coupon, may give the customer a coupon that is kept at All Granite & Marble's showroom, or the sales representative may simply give the customer a free sink. If the customer decides to receive the free All Granite & Marble sink, he or she may then choose a style of free sink for the installation.
20. Only approximately 40% of customers choose to receive the free sink from All Granite & Marble. The rest choose to purchase their own sink independent of All Granite & Marble, or they may already have a sink that they wish to use. The brand of sink is generally never discussed, and in fact, the sales representative may not even know the exact brand of sink that will be installed.
21. After the price quote has been established, the customer is informed to call All Granite & Marble when he or she is ready for the installation. After the customer



calls to inform All Granite & Marble that he or she is ready, a templator will visit the installation location to obtain exact measurements, confirm specifics of the order, and to evaluate any potential problems. The information collected by the templator is used to generate a purchase order with an exact and final charge. Additionally, the obtained details are used to generate a template necessary to form the countertop. Once formed, the countertop is installed along with any provided or free sink.

22. When the templator visits the installation site to obtain the measurements, the templator will ask the customer whether he or she will provide a sink or if All Granite & Marble will.
23. Attached as Exhibit D is a copy of a document produced by Artisan Manufacturing Corporation, bearing Bates label ART 241. This document is alleged to have originated from All Granite & Marble. However, I have never personally seen this document prior to this litigation, and after questioning All Granite & Marble's employees, including sales representatives and managers from all three locations, it does not appear that this document originated from All Granite & Marble.
24. The document not only fails to include the name All Granite & Marble on it, which is included on All Granite & Marble's sheets, but the dimensions of the sink do not match the dimensions of the sinks provided by All Granite & Marble. Further, the lead lines shown below the sink on the specification sheet do not match with the sinks that All Granite & Marble uses. Finally, the specification sheet states that the sink is 17-gauge. All Granite & Marble provides 18-gauge sinks.
25. Given the vast discrepancies between All Granite & Marble's sinks and the one on Exhibit D, it appears that the specification sheet did not originate from All Granite & Marble.

26. Stainless steel sinks have varying degrees of thickness, generally referred to as the “gauge” of the sink. The understood “market standard” for sinks is 18-gauge thickness. The higher the gauge, the thicker and more sturdy the sink, but it is generally understood that any gauge from 16 gauge to 20 gauge is acceptable and of satisfactory quality.
27. All Granite & Marble’s sinks are high quality, 18-gauge sinks, with a fine finish. I consider All Granite & Marble’s sinks to be quite satisfactory and provide for a nice, strong installation.
28. From 2003 to 2006, All Granite & Marble purchased various stainless steel sinks from Artisan for distribution to its customers. The last purchase of Artisan sinks was made on June 2, 2006. Some of the sinks purchased by All Granite & Marble were 16-gauge sinks, and some were 17-gauge sinks. Attached as Exhibit E to this Declaration are copies of invoices from Artisan, regarding the purchases that All Granite & Marble made of Artisan sinks.
29. There was never any agreement entered into between All Granite & Marble and Artisan regarding any distributorship arrangement.
30. After distributing Artisan’s sinks for a limited period of time, All Granite & Marble decided to manufacture its own sinks. The main reason for using its own sinks is that the vast majority of All Granite & Marble’s customers had never heard of “Artisan” sinks, and thus there was no brand recognition with respect to Artisan’s sinks. All Granite & Marble decided that, given the lack of recognition, it would be more cost effective to provide its own sinks rather than purchase sinks from Artisan.
31. All Granite & Marble made a conscious effort to avoid being associated with Artisan once it decided to distribute its own sinks. All Granite & Marble determined that association with Artisan would be of no benefit, since the Artisan brand was not well-known or eye-catching.

32. However, All Granite & Marble understood that customers were wary of products that had absolutely no brand or logo, and thus it decided to create its own logo, which it would affix to its sink products. At first, All Granite & Marble's sinks were distributed without a logo, but since then all of All Granite & Marble's sinks have borne its crown logo.
33. All Granite & Marble's sinks do not and have never included the word "Artisan" on them, nor have they ever included Artisan's "fleur-de-lis" logo on the sinks. Neither the word "Artisan" nor the Artisan "fleur-de-lis" logo are used in any promotion or advertising by All Granite & Marble.
34. The All Granite & Marble crown logo was created with an eye toward developing a logo that shows All Granite & Marble's strong stature, and would be geared toward its prospective customers. All Granite & Marble is a Polish-based business, which takes great pride in its Polish heritage and tradition. Thus, it sought to create a logo that would embody the strong, regal nature of the Polish tradition.
35. I instructed a former employee of All Granite & Marble, Sebastian Sroka, to create the All Granite & Marble logo. Discussing the logo with Mr. Sroka, we decided that a crown logo would embody the strong, regal nature of the Polish tradition and heritage. We then looked to the past Kings of Poland for inspiration.
36. The first King of Poland was King Boleslaw I (The Brave) of Poland, who is well-known and respected by the people of Poland. King Boleslaw's strong stature and presence made his crown a particularly fitting choice for our logo. Attached as Exhibit F to this Declaration is a portrait of King Boleslaw I, taken from [www.wikipedia.com](http://www.wikipedia.com). As can be seen, King Boleslaw's crown is even depicted on Polish currency – a testament to how famous his crown is.
37. The All Granite & Marble crown logo is King Boleslaw I's three-pronged crown, including jewels on its base, and further incorporating fancy swirled designs emanating from the base of the crown. Since All Granite & Marble wished to use

the logo at the top of a website, I asked the designer to give the crown logo a more horizontal aspect, and thus the designer stretched out the fancy swirled designs to the left and right.

38. All Granite & Marble uses this logo on its sinks, which are provided to its customers as a promotion when the customer purchases a granite countertop.
39. On January 8, 2008, I received the Complaint in this action and promptly notified All Granite & Marble's attorneys.
40. On January 9, 2008, I received notice from All Granite & Marble's attorneys that there was apparently an Artisan brand sink in the South Plainfield showroom. The attorneys instructed me to immediately confirm this sink and, if it was there, to have it removed.
41. That day, I discovered that, an Artisan brand sink was in a display for granite countertops. This sink was installed in the display at a time when All Granite & Marble was still distributing Artisan sinks to its customers and had never been removed.
42. I never noticed that the sink on display was an Artisan brand sink, since sinks are such a minimal part of the sale of a granite countertop. The brand of sink on display was not important to All Granite & Marble's business and was merely there to demonstrate what a sample installation may look like.
43. Once I discovered the Artisan sink, I instructed All Granite & Marble's employees to remove the sink as soon as possible. The very next morning, January 10, 2008, All Granite & Marble's employees removed the sink. Attached as Exhibit G are photographs taken of the removal of the Artisan sink.
44. On the morning of January 10, 2008, I notified All Granite & Marble's attorneys that the sink had been removed and that we had taken photographs of the removal.
45. I have examined All Granite & Marble's crown logo and compared it to Artisan's fleur-de-lis logo, and I believe that the two logos are substantially different.

Attached as Exhibit H to this Declaration is the All Granite & Marble crown logo.  
Attached as Exhibit I to this Declaration is a copy of the Artisan fleur-de-lis logo.

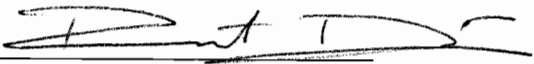
46. I have looked at logos and designs for many different industries, and have noticed many that use a "fleur-de-lis" in the logo, and continue to use the "fleur-de-lis" today. Just some of the many examples of the use of a fleur-de-lis in various industries, including sink-related fields include: The City of New Orleans, The Boy Scouts of America, the New Orleans Saints Football Team, coppersinksonline.com (sinks and accessories), shehasit.com (kitchen sink accessories), Al Simon's Cajun Microwaves (microwaves and kitchen appliances), Paini Rubinetterie (sinks and sink accessories), Braeburn Company (furniture), Charles Yorke (kitchen design and installation), Richemonte International (kitchenware and furniture), Canfloyd Trading (furniture).

47. In fact, the "fleur-de-lis" even has its own page dedicated to it on [www.wikipedia.com](http://www.wikipedia.com).

48. On February 4, 2008, I distributed a memorandum to all of the All Granite & Marble employees in each of the three store locations, informing them that All Granite & Marble has no affiliation with Artisan Manufacturing Corporation, and does not carry any Artisan brand products.

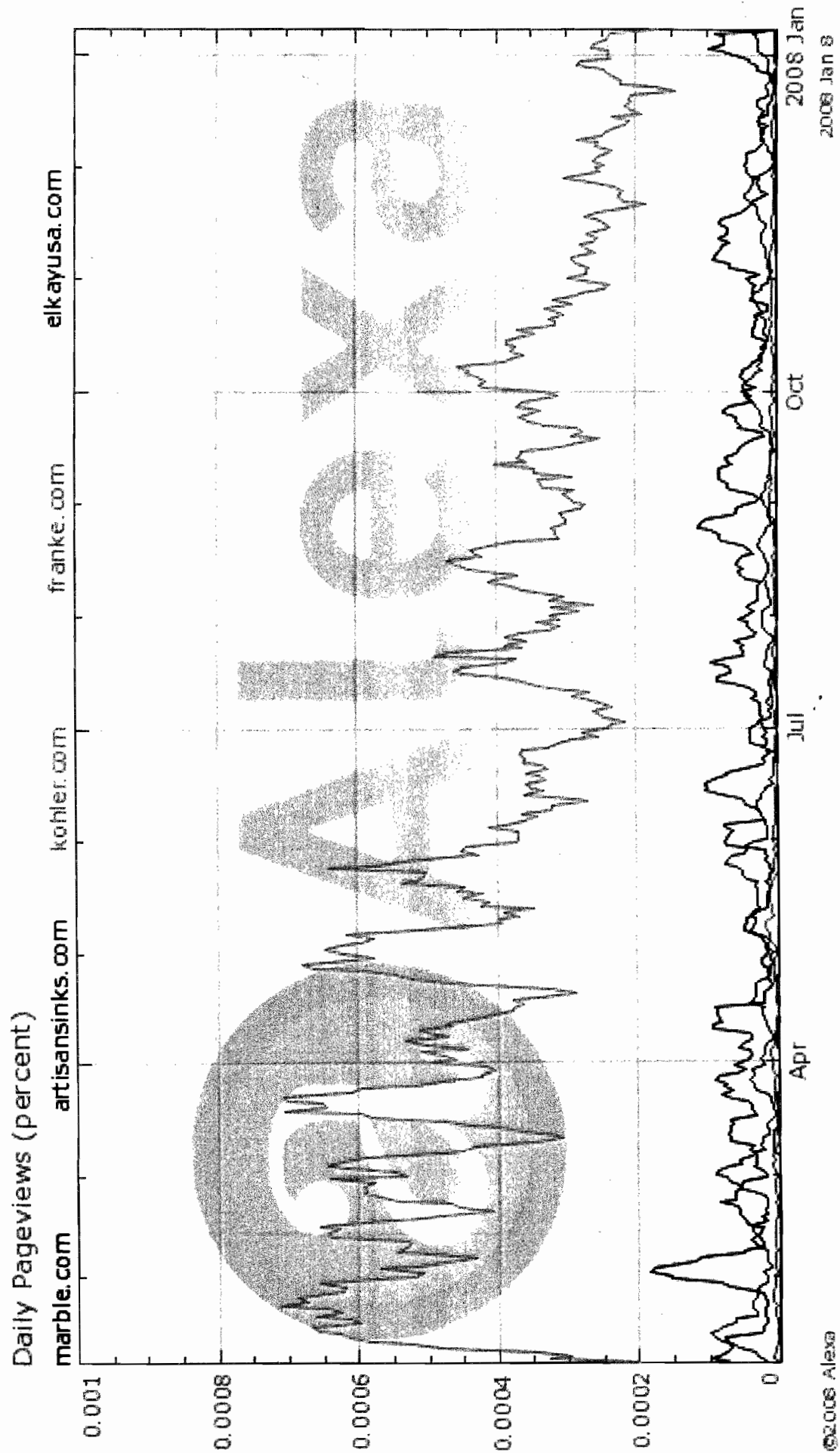
I swear that the foregoing is true and accurate under penalty of perjury.

Dated: 02/19/08

  
Robert Deja



# **EXHIBIT A**



## **EXHIBIT B**



# www.MARBLE.com

70 Storm Street, Stroudsburg, PA 18360 tel. 570.421.3333  
Visit our other locations in Ridgefield Park, NJ and South Plainfield, NJ



*The largest selection in the USA*  
**Over 1000 colors in stock!**

*From measurement to installation*  
**2 Day Turnaround!**  
*For most orders only, excluding long lead times*

**Unbeatable Prices Guaranteed!!!**

**BEST QUALITY!**

- super shiny edges with no bumps
- computer controlled cutting and polishing
- the most technologically advanced granite fabricator in the USA

**BEST PRICE GUARANTEED!**

**THOUSANDS OF SATISFIED CUSTOMERS!**

**THE BEST WEBSITE IN THE INDUSTRY!**

**SUPER FAST TURNAROUND TIME: FROM MEASUREMENTS TO INSTALLATION 2 DAYS!**



**Free!**

Granite Cleaner with 16 oz. (1/2 gallon)



**ALL SINKS FREE!**

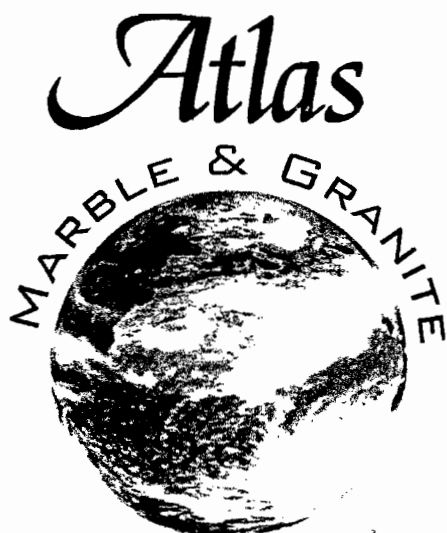
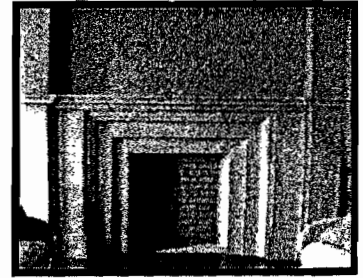
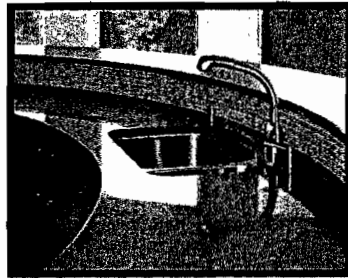
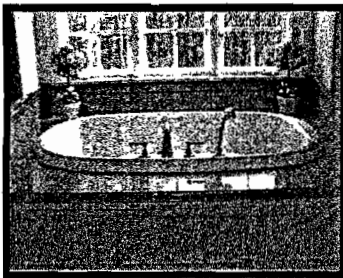
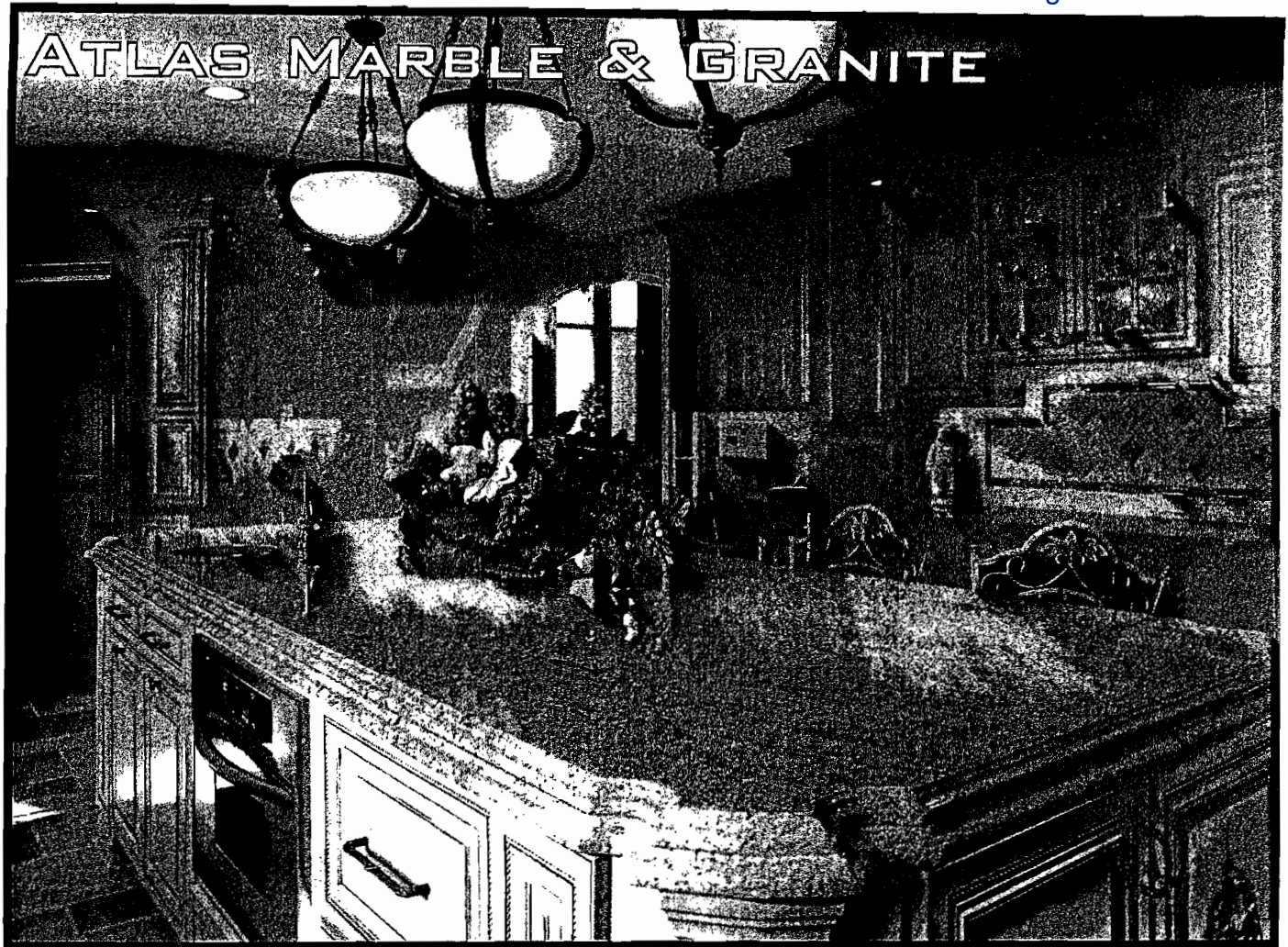
**\$360-\$540 value**

**ALL GRANITE<sup>™</sup>**  
  
**AND MARBLE CORP.**



## **EXHIBIT C**





Atlas Marble & Granite is a full service stone company with over 17 years of industry experience in the fabrication and installation of all natural stones. The company is owned and operated by stone artisans who ensure that all work meets the highest quality standards. For an elegant kitchen countertop, a striking vanity top, or any other of the countless applications of natural stone. Atlas Marble & Granite offers perfection and quality in their work, cutting edge technology, and excellent customer service.

**Atlas Marble & Granite**  
139 Ave. L Newark NJ 07105 AGM 0198  
P. 973.491.5454 F. 973.491.2654  
[Atlasmarbleandgranite.com](http://Atlasmarbleandgranite.com)

# Atlas Marble & Granite

## Show Special

Booth # 566

### Vanity Tops

24"-30"	\$400.00
36"	\$500.00
48"	\$600.00
60"	\$700.00
72"	\$800.00
84"	\$900.00

Granite, Marble,  
Travertine, Limestone.

Template, Fabrication, Choice of five edges and Installation included. No extra charge on any cutouts. \*Limited Quantity. Must present card for promo redemption. Min 25 s/f order on KCT for promo.

### FREE SINKS

#### Kitchen

- Under mount
- Stainless Steel
- Double or Single bowl

#### Vanity

- Porcelain Sink

### Kitchen Counter TOPS

\$47.00\*  
PREMIUM STONE

- Madura Gold
- Tan Brown
- Golden Oak
- Santa Cecilia

139 Avenue L  
Newark NJ 07105

**Tel: 973-491-5454**

Fax: 973-491-2654

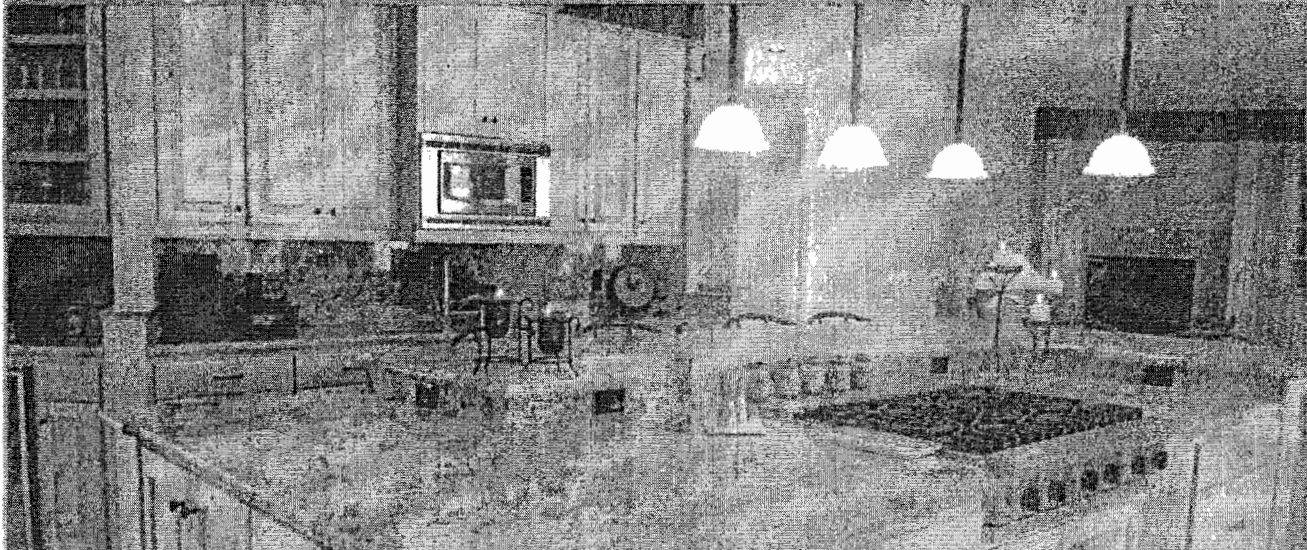
[www.atlasmarbleandgranite.com](http://www.atlasmarbleandgranite.com)





# GRANITE COUNTERTOPS

*Factory Direct Fabricator...We Sell Direct to the Public!*



**STARTING AT**

**\$35**

**Per Sq. Ft.**

**NO HIDDEN  
CHARGES**

Save over \$1000  
Call today for price

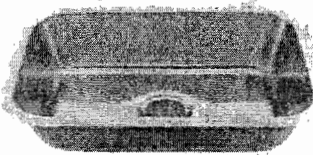
**FREE CLEANER  
FOR GRANITE  
& MARBLE**



*Great Styles  
& Selection*

**ALL  
SINKS FREE**

*For any orders over 35 sq. ft or more.  
\$350 Value • With ad only • Valid in 2008*



**CALL TODAY.**

*Have a new countertop  
in 3-4 days.*

**pacific**  
GRANITE AND MARBLE  
[www.pacificgram.com](http://www.pacificgram.com)

*Call us today, ask for details!* **973-662-1919**  
**113-115 East Centre St. • Nutley**





# Enjoy Your New Kitchen Before The Holidays!



*European Countertops by*

## GRANITE Crafters

*"One-of-a-Kind Beauty Created by Nature"*

Over 100 Styles & Colors to Choose from

*Kitchen Countertops & Backsplash*

*Natural Stone Fireplaces Marble Foyers*

*Bathroom Showers, Tubs, Jacuzzis, Dining Rooms*

*Conference Room Tables*

## FREE Kitchen Sink

**with any purchase!**

(A \$300.<sup>00</sup> Value)

With this Coupon. Cannot be combined with other offers.

One coupon per customer. Expires 1/31/08

AGM 0118

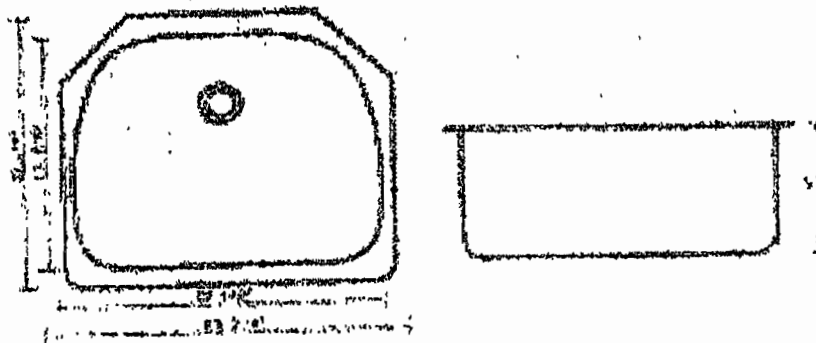
**Visit us at our New showroom in Cherry Hill, NJ  
1892 Route 70 East • Greentree Place Shopping Center • 856.751.8400**



## **EXHIBIT D**



**Artisan A210-2321-D9 Undermount Single Bowl Kitchen Sink**



**Design Features:**

**Depth:** 9"

**Material:** Heavy Duty 17 Gauge Premium 304 Mirror-finished Stainless Steel

**Finish:** Esin Finish

**Exteriors Finish:** Fully coated and with rubber pads to reduce noise and maintain water temperature

**Drain Opening:** 1 1/4" (Near Center Drain)

**Model Number:** A210-2321-D9

**Bowl Size:** 21 1/2" x 18 3/8"

**Water Depth:** 9"

ART 00241

## **EXHIBIT E**

**Artisan Manufacturing Corp**

237 Frelinghuysen Ave  
 Newark, NJ 07114  
 Phone: (973) 286-0080  
 Fax: (973) 286-2886

**INVOICE**

Date	Invoice #
10/27/2003	031027-2

Bill To	Ship To
All Granite & Marble Corp 1A Mt. Vernon Street Ridgefield Park, NJ 07660  Phone: 201 440-6779 Fax: 201 440-6855	All Granite & Marble Corp Richie Wojtach 1A Mt. Vernon Street Ridgefield Park, NJ 07660

P.O. Number	S.O. No.	Terms	Due Date	Via	Ship	Origin	Rep
		C.O.D.	10/27/2003	JPM	1/27/2004	CDW, NJ	RH
Item-Description					QTY	Price Each	Amount
17 GA Single D-Bowl Undermount 23x21x9"					6	112.00	672.00
Thank you for your business					<b>Total</b>	<b>\$672.00</b>	
					<b>Payments/Credits</b>	<b>\$-672.00</b>	
					<b>Balance Due</b>	<b>\$0.00</b>	

ART 00193

# INVOICE

Fax: (973) 286-2886

Date	Invoice #
11/5/2004	406343

Bill To	Ship To
All Granite & Marble Corp 1A Mt. Vernon Street Ridgefield Park, NJ 07660  Phone: 201 440-6779 Fax: 201 440-6855	All Granite & Marble Corp Richie Wojtach 1A Mt. Vernon Street Ridgefield Park, NJ 07660

P.O. Number	S.O. No.	Terms	Due Date	Via	Ship	Origin	Rep
	406335	C.O.D.	11/5/2004	JPM	11/5/2004	CDW, NJ	RH
Item-Description					QTY	Price Each	Amount
17 GA Double Bowl D-Style Undermount 32x20x9&7"					198	121.73029	24,102.60
17 GA Single D-Bowl Undermount 23x21x9"					102	74.49167	7,598.15
Sink Strainer					300	3.00	900.00
						-1,633.75	-1,633.75
<b>Thank you for your business</b>					<b>Total</b>	<b>\$30,967.00</b>	
					<b>Payments/Credits</b>	<b>\$-30,967.00</b>	
					<b>Balance Due</b>	<b>\$0.00</b>	

ART 00194

**Artisan Manufacturing Corp**237 Frelinghuysen Ave  
Newark, NJ 07114

Phone: (973) 286-0080

Fax: (973) 286-2886

**INVOICE**

Date	Invoice #
3/7/2005	502090

Bill To	Ship To
All Granite & Marble Corp 1A Mt. Vernon Street Ridgefield Park, NJ 07660  Phone: 201 440-6779 Fax: 201 440-6855	The Same

P.O. Number	S.O. No.	Terms	Due Date	Via	Ship	Origin	Rep
	502151	C.O.D.	3/7/2005	JPM	3/7/2005	CDW, NJ	RH
Item-Description					QTY	Price Each	Amount
17 GA Single D-Bowl Undermount 23x21x9"					150	74.49167	11,173.75
Thank you for your business					<b>Total</b>	<b>\$11,173.75</b>	
					<b>Payments/Credits</b>	<b>\$-11,173.75</b>	
					<b>Balance Due</b>	<b>\$0.00</b>	

ART 00195



**Artisan Manufacturing Corp**237 Frelinghuysen Ave  
Newark, NJ 07114

Phone: (973) 286-0080

Fax: (973) 286-2886

**INVOICE**

Date	Invoice #
4/28/2005	502335

Bill To	Ship To
All Granite & Marble Corp 1A Mt. Vernon Street Ridgefield Park, NJ 07660  Phone: 201 440-6779 Fax: 201 440-6855	The Same

P.O. Number	S.O. No.	Terms	Due Date	Via	Ship	Origin	Rep
	502195	C.O.D.	4/28/2005	JPM	4/27/2005	CDW, NJ	RH
Item-Description					QTY	Price Each	Amount
17 GA Single D-Bowl Undermount 23x21x9"					150	74.49167	11,173.75
<div style="text-align: center; font-size: 2em; transform: rotate(-10deg);">ART 00196</div>					<b>Total</b>		<b>\$11,173.75</b>
					<b>Payments/Credits</b>		<b>\$-11,173.75</b>
					<b>Balance Due</b>		<b>\$0.00</b>
					<b>Thank you for your business</b>		

**Artisan Manufacturing Corp**237 Frelinghuysen Ave  
Newark, NJ 07114

Phone: (973) 286-0080

Fax: (973) 286-2886

**INVOICE**

Date	Invoice #
7/19/2005	502929

Bill To	Ship To
All Granite & Marble Corp 1A Mt. Vernon Street Ridgefield Park, NJ 07660  Phone: 201 440-6779 Fax: 201 440-6855	The Same

P.O. Number	S.O. No.	Terms	Due Date	Via	Ship	Origin	Rep
	502998	C.O.D.	7/19/2005	JPM	7/18/2005	Hanover	RH
Item-Description					QTY	Price Each	Amount
17 GA Single D-Bowl Undermount 23x21x9"					36	0.00	0.00
Replacement for sinks we borrowed							
ART 00197							
Thank you for your business					<b>Total</b>	<b>\$0.00</b>	
					<b>Payments/Credits</b>	<b>\$0.00</b>	
					<b>Balance Due</b>	<b>\$0.00</b>	

**Artisan Manufacturing Corp**

237 Frelinghuysen Ave  
Newark, NJ 07114

Phone: (973) 286-0080

Fax: (973) 286-2886

**INVOICE**

Date	Invoice #
7/28/2005	503017

Bill To	Ship To
All Granite & Marble Corp 1A Mt. Vernon Street Ridgefield Park, NJ 07660  Phone: 201 440-6779 Fax: 201 440-6855	Same

P.O. Number	S.O. No.	Terms	Due Date	Via	Ship	Origin	Rep
Fax	503024	C.O.D.	7/28/2005	JPM	7/26/2005	Hanover	RH
Item-Description					QTY	Price Each	Amount
17 GA Single D-Bowl Undermount 23x21x9"					40	74.49167	2,979.67
Balance of 260 to follow							
ART 00198							
Thank you for your business					<b>Total</b>		<b>\$2,979.67</b>
					<b>Payments/Credits</b>		<b>\$-2,979.67</b>
					<b>Balance Due</b>		<b>\$0.00</b>

**Artisan Manufacturing Corp**237 Frelinghuysen Ave  
Newark, NJ 07114

Phone: (973) 286-0080

Fax: (973) 286-2886

**INVOICE**

Date	Invoice #
8/5/2005	503097

Bill To	Ship To
All Granite & Marble Corp 1A Mt. Vernon Street Ridgefield Park, NJ 07660  Phone: 201 440-6779 Fax: 201 440-6855	Same

P.O. Number	S.O. No.	Terms	Due Date	Via	Ship	Origin	Rep
Fax 7/13/05	503066	C.O.D.	8/5/2005	JPM	8/4/2005	Hanover	RH
Item-Description					QTY	Price Each	Amount
17 GA Single D-Bowl Undermount 23x21x9"					20	74.49167	1,489.83
Item AUD 2321 D9- Back Ordered-20							
ART 00199							
Thank you for your business					<b>Total</b>		<b>\$1,489.83</b>
					<b>Payments/Credits</b>		<b>\$-1,489.83</b>
					<b>Balance Due</b>		<b>\$0.00</b>



**Artisan Manufacturing Corp**237 Frelinghuysen Ave  
Newark, NJ 07114

Phone: (973) 286-0080

Fax: (973) 286-2886

**INVOICE**

Date	Invoice #
8/24/2005	503221

Bill To	Ship To
<b>PAID</b> All Granite & Marble Corp 1A Mt. Vernon Street Ridgefield Park, NJ 07660  Phone: 201 440-6779 Fax: 201 440-6855	Same

P.O. Number	S.O. No.	Terms	Due Date	Via	Ship	Origin	Rep
Fax7/13/05-...	503186	C.O.D.	8/24/2005	JPM	8/22/2005	Hanover,NJ	RH
Item-Description					QTY	Price Each	Amount
17 GA Single D-Bowl Undermount 23x21x9"					20	74.49167	1,489.83
ART 00200							
Thank you for your business					<b>Total</b>	<b>\$1,489.83</b>	
					<b>Payments/Credits</b>	<b>\$-1,489.83</b>	
					<b>Balance Due</b>	<b>\$0.00</b>	

**Artisan Manufacturing Corp**237 Frelinghuysen Ave  
Newark, NJ 07114

Phone: (973) 286-0080

Fax: (973) 286-2886

**INVOICE**

Date	Invoice #
8/24/2005	503222

Bill To	Ship To
All Granite & Marble Corp 1A Mt. Vernon Street Ridgefield Park, NJ 07660  Phone: 201 440-6779 Fax: 201 440-6855	Same

P.O. Number	S.O. No.	Terms	Due Date	Via	Ship	Origin	Rep
Fax 7/13/05-2	503067	C.O.D.	8/24/2005	JPM	8/22/2005	Hanover,NJ	RH
Item-Description					QTY	Price Each	Amount
17 GA Single D-Bowl Undermount 23x21x9"					40	74.49167	2,979.67
ART 00201							
Thank you for your business					Total		\$2,979.67
					Payments/Credits		\$-2,979.67
					Balance Due		\$0.00

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Fax: (973) 286-2886

**INVOICE**

Date	Invoice #
9/1/2005	503303

Bill To	Ship To
All Granite & Marble Corp 1A Mt. Vernon Street Ridgefield Park, NJ 07660  Phone: 201 440-6779 Fax: 201 440-6855	All Granite & Marble Corp Richie Wojtach 1A Mt. Vernon Street Ridgefield Park, NJ 07660

P.O. Number	S.O. No.	Terms	Due Date	Via	Ship	Origin	Rep
Sample /Frank	503358		9/1/2005	UPS Ground	9/1/2005	CDW, NJ	RH
Item-Description					QTY	Price Each	Amount
17 GA Double Bowl D-Style Undermount 32x20x9&7"					1	0.00	0.00
Shipping & Handling					1	0.00	
Warehouse Clearance No Returns							
ART 00202							
Thank you for your business						<b>Total</b>	<b>\$0.00</b>
						<b>Payments/Credits</b>	<b>\$0.00</b>
						<b>Balance Due</b>	<b>\$0.00</b>

**Artisan Manufacturing Corp**237 Frelinghuysen Ave  
Newark, NJ 07114

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Fax: (973) 286-2886

**INVOICE**

Date	Invoice #
9/8/2005	503334

Bill To	Ship To
All Granite & Marble Corp 1A Mt. Vernon Street Ridgefield Park, NJ 07660  Phone: 201 440-6779 Fax: 201 440-6855	All Granite & Marble Corp Richie Wojtach 1A Mt. Vernon Street Ridgefield Park, NJ 07660

P.O. Number	S.O. No.	Terms	Due Date	Via	Ship	Origin	Rep
Fax	503374	C.O.D.	9/8/2005	JPM	9/7/2005	CDW	RH
Item-Description					QTY	Price Each	Amount
17 GA Double Bowl D-Style Undermount 32x20x9&7"					100	103.47	10,347.00
WAREHOUSE CLEARANCE - NO RETURNS DISCOUNT REFLECTED IN UNIT COST							
ART 00203							
Thank you for your business					<b>Total</b>		<b>\$10,347.00</b>
					<b>Payments/Credits</b>		<b>\$-10,347.00</b>
					<b>Balance Due</b>		<b>\$0.00</b>



**Artisan Manufacturing Corp**

237 Frelinghuysen Ave

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Fax: (973) 286-2886

**INVOICE**

Date	Invoice #
10/4/2005	503534

Bill To	Ship To
All Granite & Marble Corp 1A Mt. Vernon Street Ridgefield Park, NJ 07660  Phone: 201 440-6779 Fax: 201 440-6855	Same

P.O. Number	S.O. No.	Terms	Due Date	Via	Ship	Origin	Rep
Fax 7/13/05-3	503068	C.O.D.	10/4/2005	JPM	10/3/2005	Hanover	RH
Item-Description					QTY	Price Each	Amount
17 GA Single D-Bowl Undermount 23x21x9"					40	74.49167	2,979.67
ART 00204							
Thank you for your business					<b>Total</b>		<b>\$2,979.67</b>
					<b>Payments/Credits</b>		<b>\$-2,979.67</b>
					<b>Balance Due</b>		<b>\$0.00</b>

**Artisan Manufacturing Corp**

237 Frelinghuysen Ave

Newark, NJ 07114

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Fax: (973) 286-2886

**INVOICE**

Date	Invoice #
10/14/2005	503599

Bill To	Ship To
All Granite & Marble Corp 1A Mt. Vernon Street Ridgefield Park, NJ 07660  Phone: 201 440-6779 Fax: 201 440-6855	Same

P.O. Number	S.O. No.	Terms	Due Date	Via	Ship	Origin	Rep
Fax 7/13/05-4	503069	C.O.D.	10/14/2005	JPM	10/13/2005	Hanover	RH
Item-Description					QTY	Price Each	Amount
17 GA Single D-Bowl Undermount 23x21x9"					40	74.49167	2,979.67
ART 00205							
Thank you for your business					<b>Total</b>		<b>\$2,979.67</b>
					<b>Payments/Credits</b>		<b>\$-2,979.67</b>
					<b>Balance Due</b>		<b>\$0.00</b>

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Fax: (973) 286-2886

**INVOICE**

Date	Invoice #
10/28/2005	503778

Bill To	Ship To
All Granite & Marble Corp 1A Mt. Vernon Street Ridgefield Park, NJ 07660  Phone: 201 440-6779 Fax: 201 440-6855	Same

P.O. Number	S.O. No.	Terms	Due Date	Via	Ship	Origin	Rep
Fax 7/13/05-5	503070	C.O.D.	10/28/2005	JPM	10/27/2005	Hanover	RH
Item-Description					QTY	Price Each	Amount
17 GA Single D-Bowl Undermount 23x21x9"					40	74.49167	2,979.67
<div style="text-align: center; font-size: 2em; transform: rotate(-10deg);">ART 00206</div>					<b>Total</b>		<b>\$2,979.67</b>
					<b>Payments/Credits</b>		<b>\$-2,979.67</b>
					<b>Balance Due</b>		<b>\$0.00</b>
<b>Thank you for your business</b>							

**Artisan Manufacturing Corp**

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Fax: (973) 286-2886

**INVOICE**

Date	Invoice #
11/10/2005	503896

Bill To	Ship To
All Granite & Marble Corp 1A Mt. Vernon Street Ridgefield Park, NJ 07660  Phone: 201 440-6779 Fax: 201 440-6855	Same

P.O. Number	S.O. No.	Terms	Due Date	Via	Ship	Origin	Rep
Fax 7/13/05-6	503071	C.O.D.	11/10/2005	JPM	11/8/2005	Hanover	RH
Item-Description					QTY	Price Each	Amount
17 GA Single D-Bowl Undermount 23x21x9"					40	74.49167	2,979.67
ART 00207							
Thank you for your business					Total		\$2,979.67
					Payments/Credits		\$-2,979.67
					Balance Due		\$0.00



**Artisan Manufacturing Corp**

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Fax: (973) 286-2886

**INVOICE**

Date	Invoice #
11/18/2005	503960

Bill To	Ship To
All Granite & Marble Corp 1A Mt. Vernon Street Ridgefield Park, NJ 07660  Phone: 201 440-6779 Fax: 201 440-6855	Same

P.O. Number	S.O. No.	Terms	Due Date	Via	Ship	Origin	Rep
Fax 7/13/05-7	503072	C.O.D.	11/18/2005	JPM	11/17/2005	Hanover	RH
Item-Description					QTY	Price Each	Amount
17 GA Single D-Bowl Undermount 23x21x9"					20	74.49167	1,489.83
ART 00208							
Thank you for your business					<b>Total</b>	<b>\$1,489.83</b>	
					<b>Payments/Credits</b>	<b>\$-1,489.83</b>	
					<b>Balance Due</b>	<b>\$0.00</b>	

**Artisan Manufacturing Corp**

237 Frelinghuysen Ave  
 Newark, NJ 07114  
 Phone: (973) 286-0080  
 Fax: (973) 286-2886

**INVOICE**

Date	Invoice #
1/26/2006	504584

Bill To	Ship To
All Granite & Marble Corp 1A Mt. Vernon Street Ridgefield Park, NJ 07660  Phone: 201 440-6779 Fax: 201 440-6855	All Granite & Marble Corp Richie Wojtach 1A Mt. Vernon Street Ridgefield Park, NJ 07660

P.O. Number	S.O. No.	Terms	Due Date	Via	Ship	Origin	Rep
Fax-01/23	504588	Due on receipt	1/26/2006	JPM	1/25/2006	Hanover, NJ	RH
Item-Description					QTY	Price Each	Amount
17 GA Single D-Bowl Undermount 23x21x9"					100	74.49	7,449.00
ART 00209							
Thank you for your business					<b>Total</b>	<b>\$7,449.00</b>	
					<b>Payments/Credits</b>	<b>\$-7,449.00</b>	
					<b>Balance Due</b>	<b>\$0.00</b>	

**Artisan Manufacturing Corp**237 Frelinghuysen Ave  
Newark, NJ 07114

Phone: (973) 286-0080

Fax: (973) 286-2886

**INVOICE**

Date	Invoice #
3/28/2006	505173

Bill To	Ship To
All Granite & Marble Corp 1A Mt. Vernon Street Ridgefield Park, NJ 07660  Phone: 201 440-6779 Fax: 201 440-6855	All Granite & Marble Corp Richie Wojtach 1A Mt. Vernon Street Ridgefield Park, NJ 07660

P.O. Number	S.O. No.	Terms	Due Date	Via	Ship	Origin	Rep
FAX	505108	Due on receipt	3/28/2006	JPM	3/27/2006	Hanover, NJ	RH
Item-Description					QTY	Price Each	Amount
16 GA Single D Bowl Undermount 23x21x9"					200	79.52	15,904.00
ART 00210							
Thank you for your business					<b>Total</b>		<b>\$15,904.00</b>
					<b>Payments/Credits</b>		<b>\$-15,904.00</b>
					<b>Balance Due</b>		<b>\$0.00</b>



**Artisan Manufacturing Corp**

237 Frelinghuysen Ave

Newark, NJ 07114

Phone: (973) 286-0080

Fax: (973) 286-2886

**INVOICE**

Date	Invoice #
4/20/2006	505436

Bill To	Ship To
All Granite & Marble Corp 1A Mt. Vernon Street Ridgefield Park, NJ 07660  Phone: 201 440-6779 Fax: 201 440-6855	All Granite & Marble Corp Richie Wojtach 1A Mt. Vernon Street Ridgefield Park, NJ 07660

P.O. Number	S.O. No.	Terms	Due Date	Via	Ship	Origin	Rep
FAX 4/18/06	505393	Due on receipt	4/20/2006	JPM	4/20/2006	Hanover, NJ	RH
Item-Description					QTY	Price Each	Amount
16 GA Double D Bowl Undermount 32x20x9/7"					48	129.96	6,238.08
16 GA Double D Bowl Undermount 32x20x9/7"					4	129.96	519.84
ART 00211					Total		\$6,757.92
					Payments/Credits		\$-6,757.92
					Balance Due		\$0.00
Thank you for your business							

**Artisan Manufacturing Corp**

237 Frelinghuysen Ave

Newark, NJ 07114

Phone: (973) 286-0080

Fax: (973) 286-2886

**INVOICE**

Date	Invoice #
6/1/2006	505916

Bill To	Ship To
All Granite & Marble Corp 1A Mt. Vernon Street Ridgefield Park, NJ 07660  Phone: 201 440-6779 Fax: 201 440-6855	All Granite & Marble Corp Richie Wojtach 1A Mt. Vernon Street Ridgefield Park, NJ 07660

P.O. Number	S.O. No.	Terms	Due Date	Via	Ship	Origin	Rep
Fax	505866	Due on receipt	6/1/2006	Pick Up	6/1/2006	Hanover, NJ	RH
Item-Description					QTY	Price Each	Amount
16 GA Double D Bowl Undermount 32x20x9/7"					8	129.96	1,039.68
ART 00212							
Thank you for your business					<b>Total</b>	<b>\$1,039.68</b>	
					<b>Payments/Credits</b>	<b>\$-1,039.68</b>	
					<b>Balance Due</b>	<b>\$0.00</b>	

**Artisan Manufacturing Corp**237 Frelinghuysen Ave  
Newark, NJ 07114

Phone: (973) 286-0080

Fax: (973) 286-2886

**INVOICE**

Date	Invoice #
6/2/2006	505925

Bill To	Ship To
All Granite & Marble Corp 1A Mt. Vernon Street Ridgefield Park, NJ 07660  Phone: 201 440-6779 Fax: 201 440-6855	All Granite & Marble Corp Richie Wojtach 1A Mt. Vernon Street Ridgefield Park, NJ 07660

P.O. Number	S.O. No.	Terms	Due Date	Via	Ship	Origin	Rep
Fax	505875	Due on receipt	6/2/2006	JPM	6/2/2006	Hanover, NJ	RH
Item-Description					QTY	Price Each	Amount
16 GA Double D Bowl Undermount 32x20x9/7"					100	129.96	12,996.00
ART 00213							
Thank you for your business					<b>Total</b>	<b>\$12,996.00</b>	
					<b>Payments/Credits</b>	<b>\$-12,996.00</b>	
					<b>Balance Due</b>	<b>\$0.00</b>	



## **EXHIBIT F**

# Boleslaw I of Poland

From Wikipedia, the free encyclopedia

**Bolesław I the Brave** (or **Valiant**) (Polish: *Bolesław I Chrobry*; Czech: *Boleslav Chrabrý*; 967 - June 17, 1025), in the past also known as Bolesław I the Great (Polish: *Bolesław I Wielki*), of the Piast Dynasty — son of Mieszko I and of his first wife, the Bohemian princess Dobrawa — ruled as Duke of Poland, 992-1025, and as King of Poland in 1025.

## Biography

In 984 Bolesław married an unknown daughter of Rikdag (Riddag, Ricdag), Margrave of Meißen. Subsequently he married an unknown woman from Hungary, maybe a daughter of Geza, Grand Duke of Hungary; then Emnilda, daughter of Dobromir; and lastly Oda, another daughter of the Margrave of Meißen. His wives bore him sons, including Bezprym, Mieszko II and Otton; and a daughter, Mathilde. After his father's death around 992, Bolesław expelled his father's second wife, Oda von Haldensleben, and her sons, thereby attempting to unite Poland again.

In 997 Bolesław sent Saint Adalbert of Prague to Prussia, on the Baltic Sea, on a mission to convert the heathen Prussians to Christianity — an attempt that would end in Adalbert's martyrdom and subsequent canonization.

From his father, he had inherited their principality, centered on Greater Poland, being along the river Warta ("valley of Warta"), and much smaller than modern Poland.

By 997, Bolesław already possessed Silesia and Pomerania (with its chief city, Gdańsk) and Lesser Poland (with its chief city, Cracow). In 1002 Bolesław annexed present-day Moravia, and in 1001 or 1003, parts of present-day Slovakia.

In 1000, Emperor Otto III, while on pilgrimage to the tomb of St. Adalbert at Gniezno, invested

### Boleslaw I (the Brave)

*King of Poland*



Portrait by Jan Matejko (1838)

<b>Reign</b>	<i>Duke</i> : 992 – April 18, 1025 <i>King</i> : April 18 - June 17, 1025
<b>Coronation</b>	April 18, 1025 Gniezno Cathedral, Poland.
<b>Born</b>	967
<b>Died</b>	June 17, 1025 Poznań
<b>Buried</b>	Cathedral Basilica of St. Peter and St. Paul, Poznań
<b>Predecessor</b>	Mieszko I
<b>Successor</b>	Mieszko II Lambert
<b>Wife/wives</b>	unknown daughter of Rikdag uknkown princess from Hungary Emnilda Oda
<b>Issue</b>	<i>With second spouse</i> : Bezprym <i>With Emnilda</i> : Regelinda, Mieszko II Lambert, Otton <i>With Oda</i> : Matilda
<b>Dynasty</b>	Piast dynasty
<b>Father</b>	Mieszko I
<b>Mother</b>	Dobrawa



Dinar of Boleslaw I

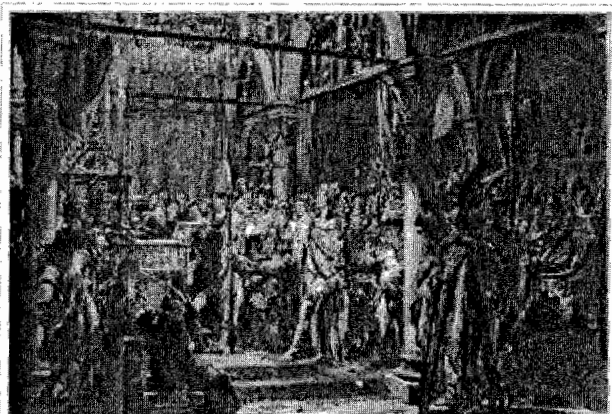
Bolesław with the title *Frater et Cooperator Imperii* ("Brother and Partner in the Empire"). Some historians state that the Emperor also pledged a royal crown to Bolesław. During that same visit, Otto III accepted Gniezno's status as an archbishopric (see Congress of Gniezno).

After the untimely death of the Emperor Otto III at age 22 in 1002, Bolesław supported Eckard I, Margrave of Meissen for the German throne. When Eckard was assassinated in April, Bolesław lent his support to Henry IV, Duke of Bavaria, and helped make him King as Henry II. Bolesław and his father had earlier backed Henry II, Duke of Bavaria, against Otto, and Henry IV was the son of the earlier Henry. With Eckard dead, Bolesław laid claim to the March of Meissen as a relative of Eckard through marriage, but Henry only acquiesced to give him the March of Lusatia and detach it from Meissen. Henry remained suspicious of Bolesław for his

early support for Eckard and Bolesław for his part remained committed to extending his own territories at the expense of the Empire.

Bolesław conquered, and made himself Duke of, Bohemia in 1003 - 1004, ruling as Boleslav IV.

At the request of his son-in-law Sviatopolk I of Kiev, the Polish duke intervened in Kievan affairs: not only did he expel Yaroslav the Wise from Kiev, but possibly he deployed his troops in Rus' capital for about half a year (see Kiev Expedition of 1018). According to popular legend Bolesław notched his sword hitting the gate of Kiev (this sword called *Szczerbiec* is a symbol of polish monarchy). During this campaign Poland re-annexed the Red Strongholds, later called Red Ruthenia, lost by Bolesław's father in 981.



"Coronation of the First King of Poland," by Jan Matejko, 1889, oil on canvas, Royal Castle, Warsaw.

The intermittent wars with the Holy Roman Empire ended with the Peace of Bautzen in 1018, which left Sorbian Meissen and Lusatia in Polish hands.

Emperor Henry II obliged Bolesław to pledge his fealty again in exchange for the lands that he held in fief. After Henry's death in 1024, Bolesław crowned himself king (1025), thus raising Poland to the rank of a kingdom and being the first Polish king, his predecessors having been "princes".

Bolesław sent an army to aid his friend — also his nephew, son of his sister Sigrid — Canute the Great in his conquest of England.

Bolesław's son, Mieszko II, crowned himself king immediately upon his father's death.

## Significance of Bolesław's reign in Polish history



Bolesław was the first Polish king, since it was during his reign that Poland became a kingdom, despite the fact that some Polish rulers before 1295 would never receive a crown. Poland had thus the royal status before their ethnic relatives and neighbors, Bohemia.

He was the first Polish ruler that had been baptised at birth, thus the first real Christian ruler of Poland. He founded the independent Polish province of the Church and made Poland a strong power in Europe.

Bolesław for the first time unified all the provinces that subsequently came to comprise the traditional territory of Poland: Greater Poland, Lesser Poland, Masovia, Silesia and Pomerania

He was a national hero to the Sorbs of Lusatia.

## See also

- History of Poland (966-1385)



Bolesław Chrobry and Svetopelk at Kiev, in a legendary (if ahistorical) moment of hitting the Golden Gate with Szczerbiec sword. Painting by Jan Matejko.

Boleslaw I of Poland		
Piast Dynasty		
Born: 966 or 967		Died: 17 June 1025
Preceded by <b>Mieszko I</b>	<b>Duke of the Polans</b> May 25, 992 — June 17, 1025 <b>King of Poland</b> (since April 18, 1025)	Succeeded by <b>King</b> <b>Mieszko II Lambert</b>
Preceded by <b>Vladivoj</b>	<b>Duke of Bohemia</b> 1003 — 1004	Succeeded by <b>Jaromir</b>

Retrieved from "[http://en.wikipedia.org/wiki/Boleslaw\\_I\\_of\\_Poland](http://en.wikipedia.org/wiki/Boleslaw_I_of_Poland)"

Categories: Articles lacking sources from November 2007 | All articles lacking sources | Polish monarchs | Bohemian monarchs | House of Piast | Poznań | 960s births | 1025 deaths

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## **EXHIBIT G**



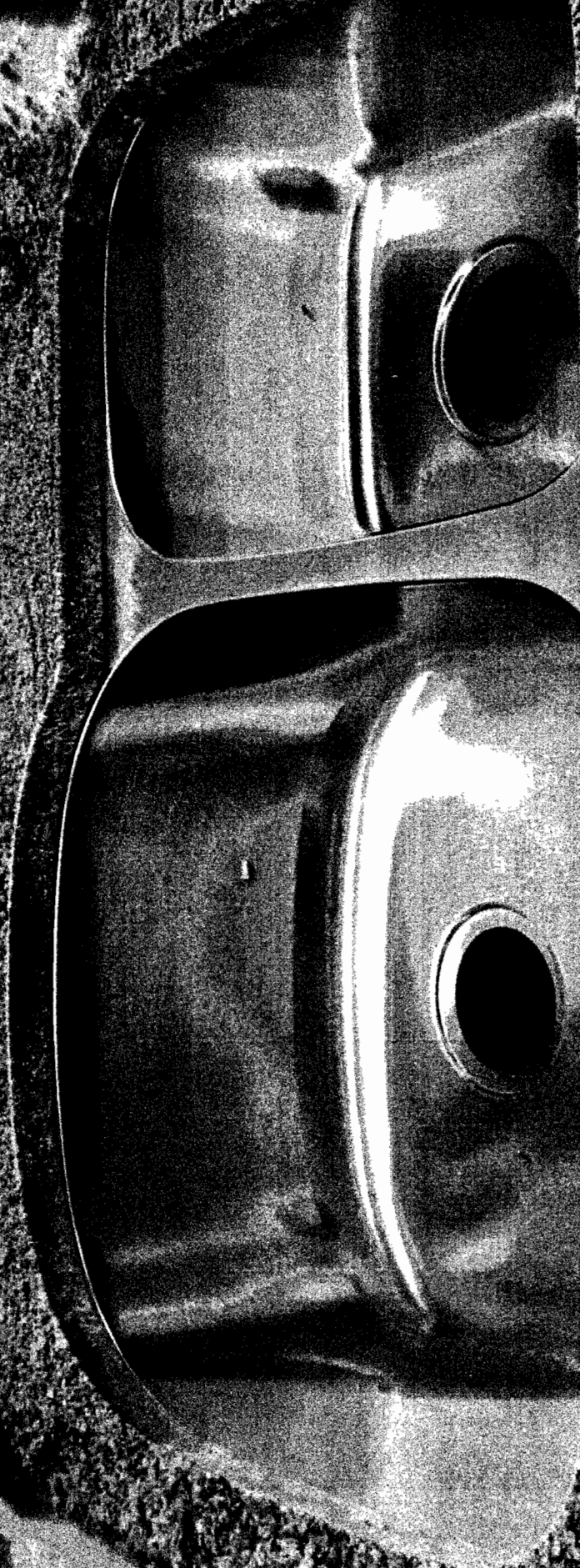




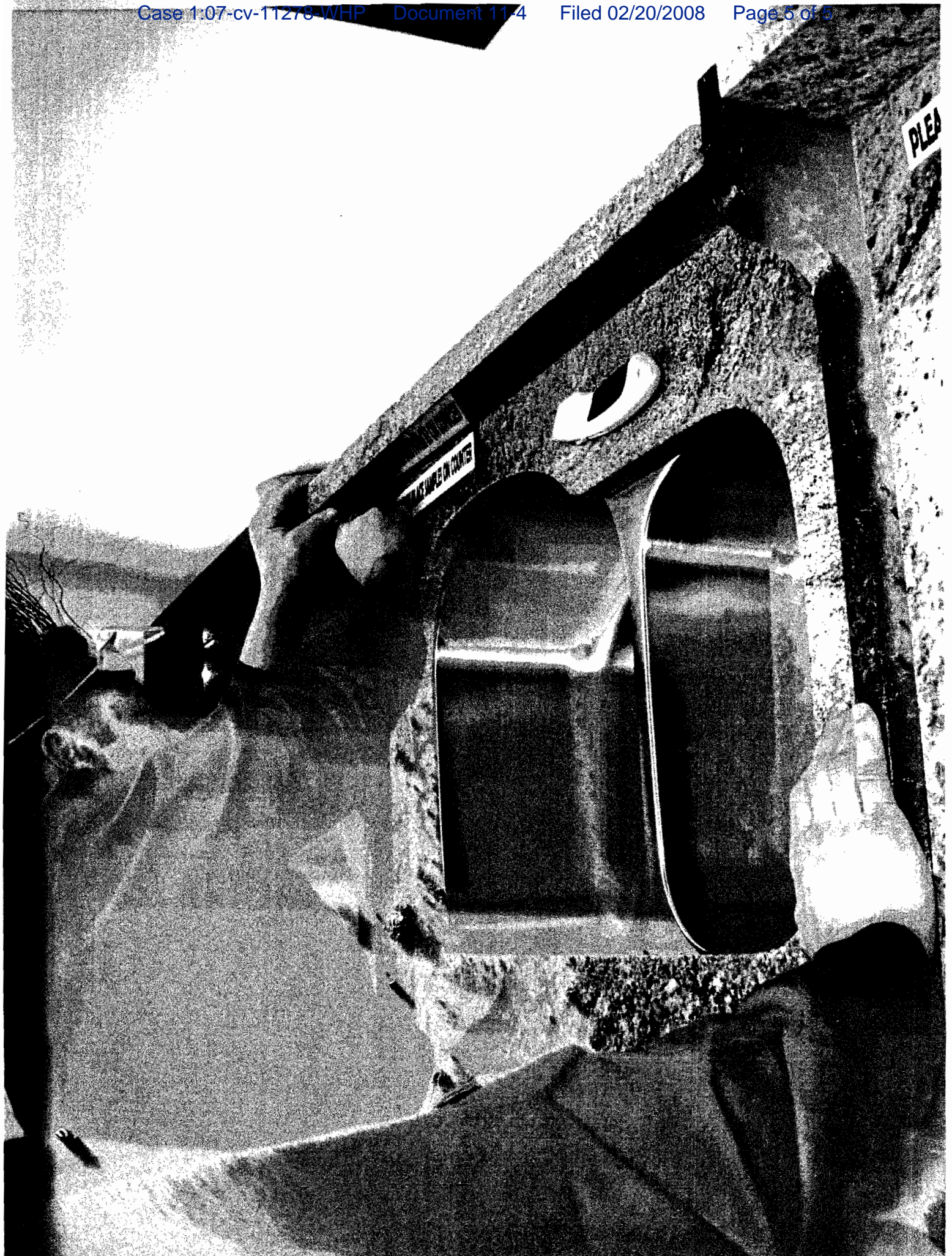




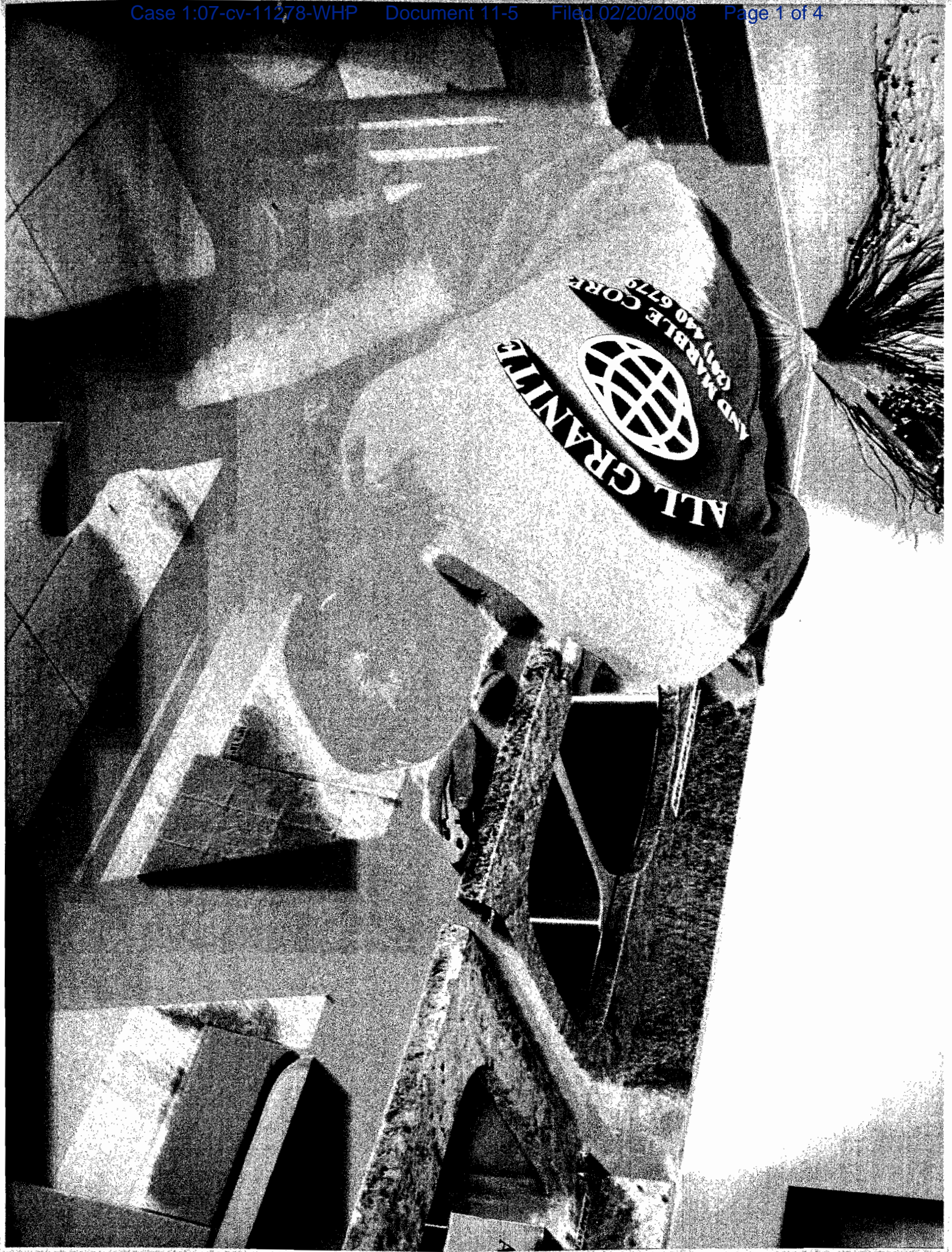
PLEASE DO NOT PLACE SAMPLES ON COUNTER











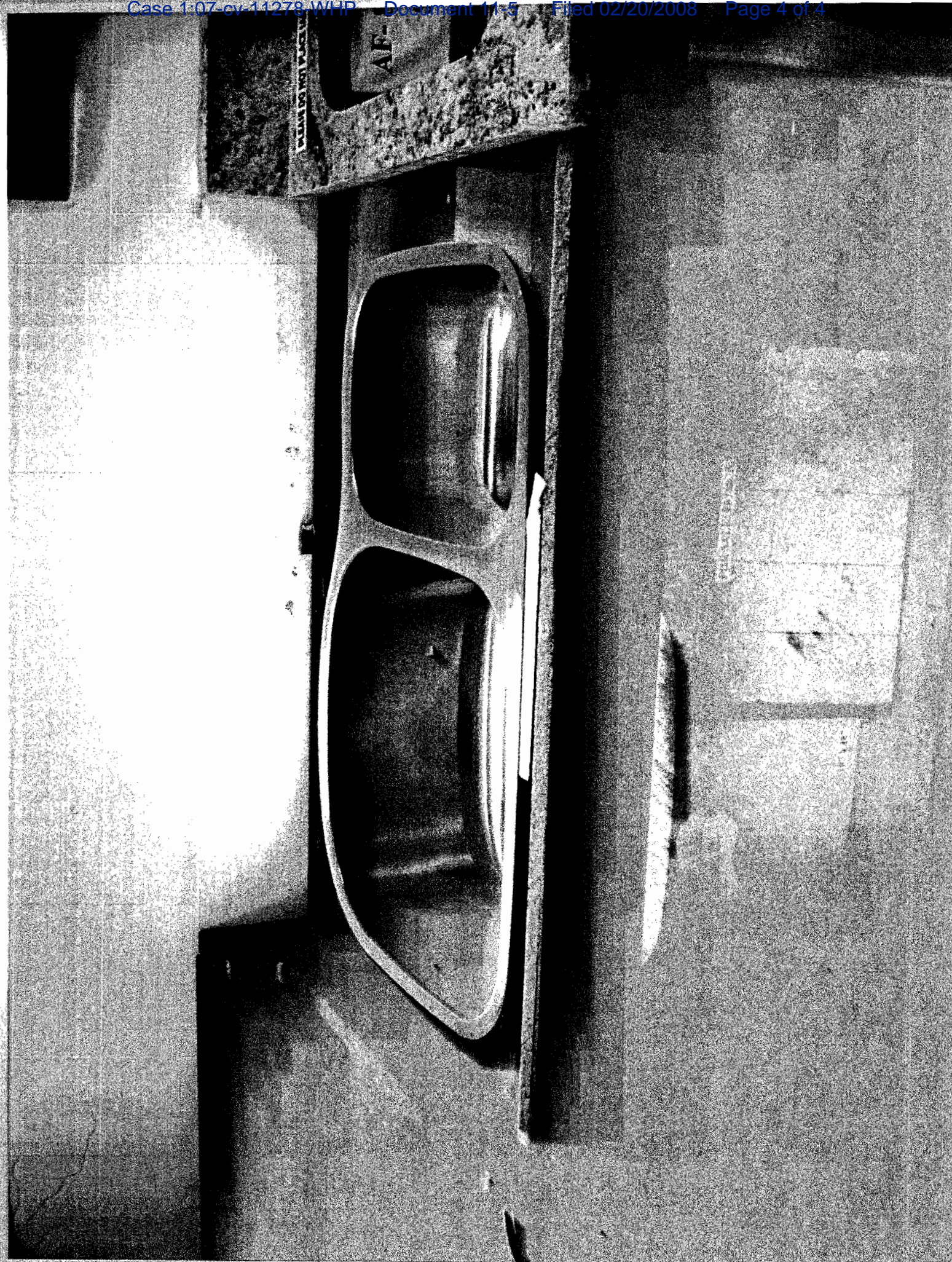




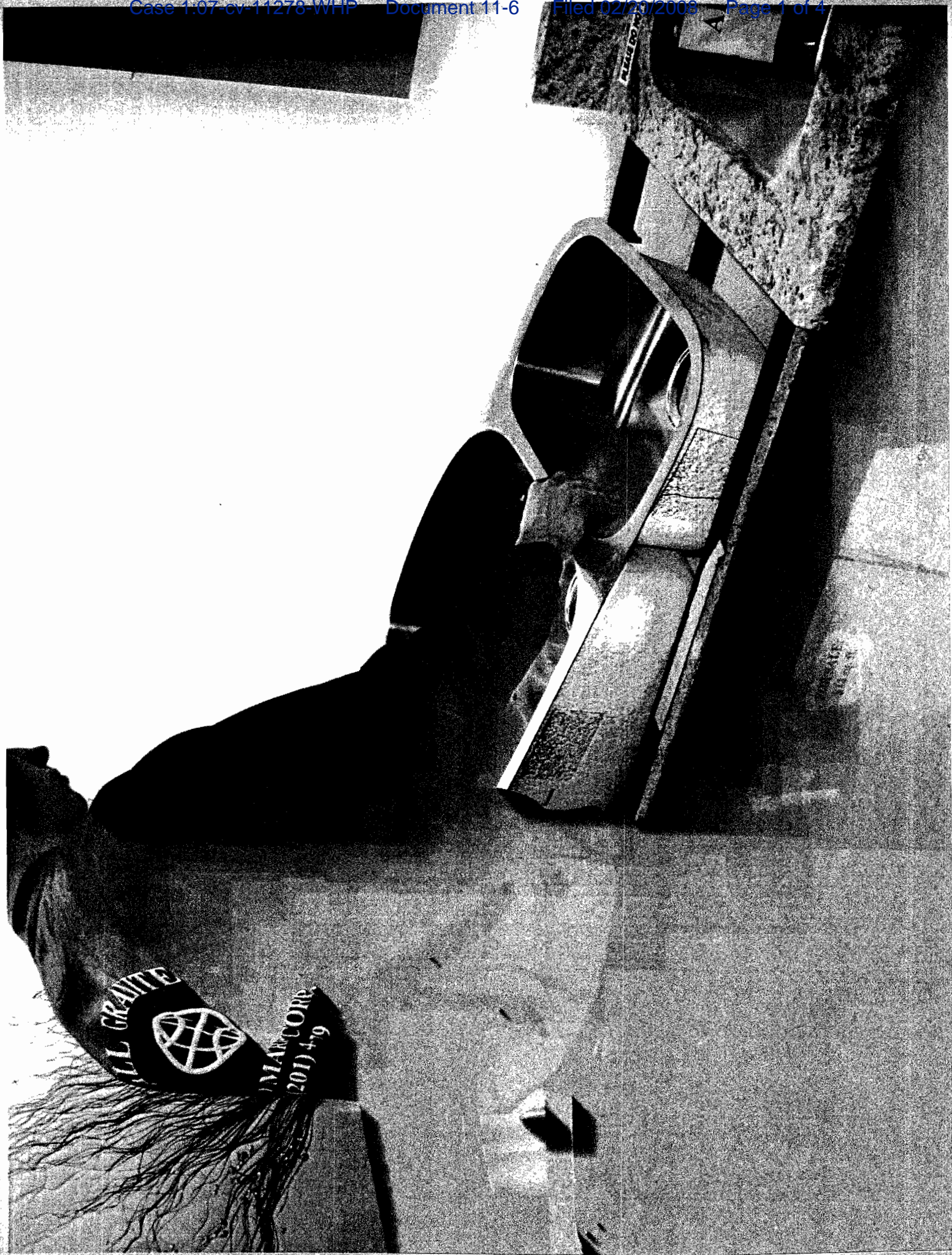












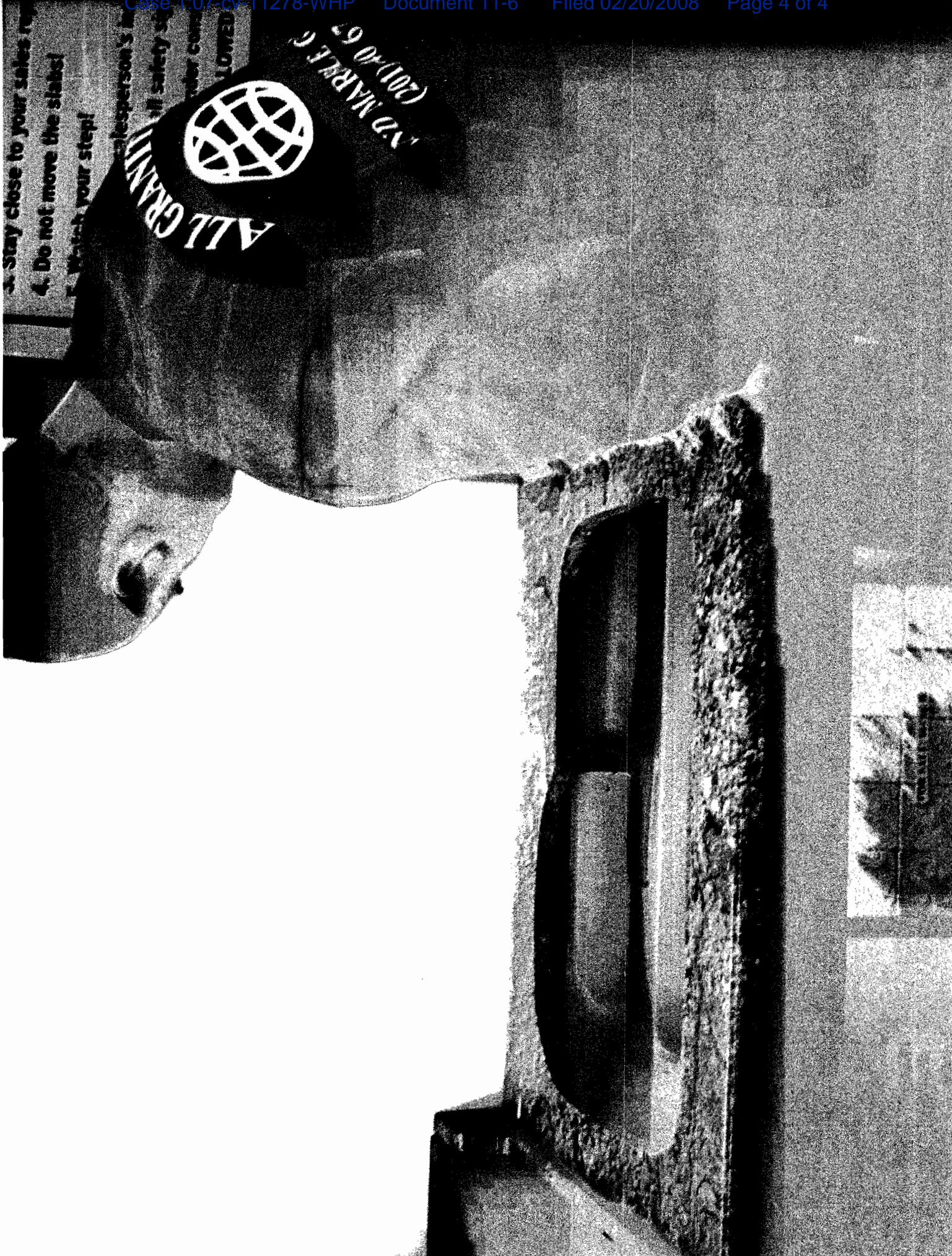












3. Stay close to your sales rep.  
4. Do not move the slabs!  
5. Watch your steps!

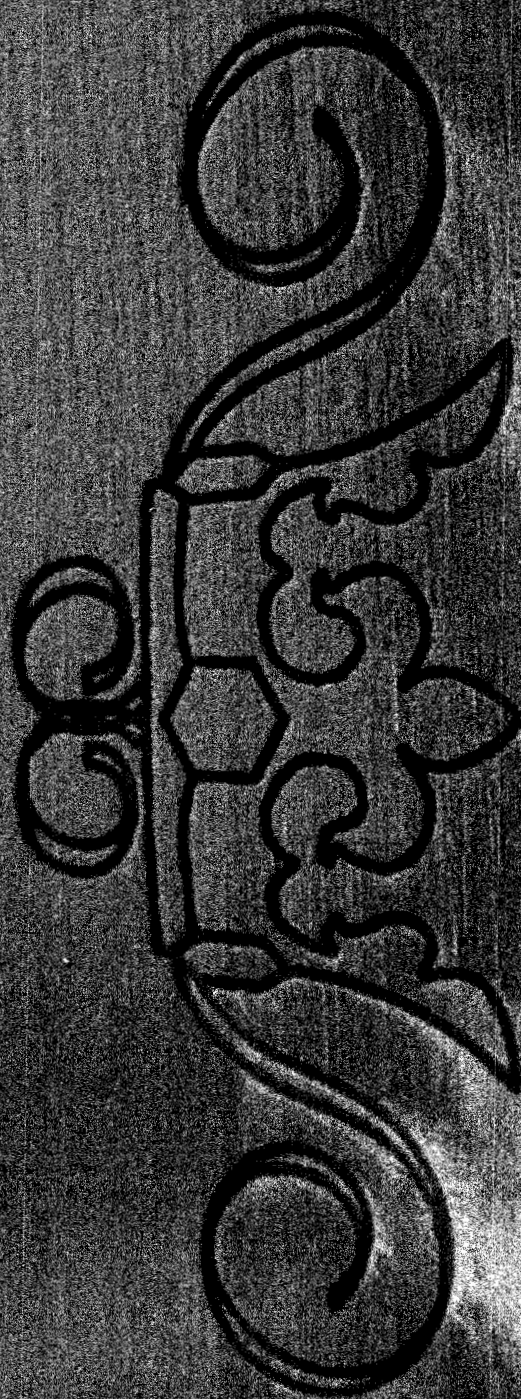
Salesperson's name  
will safety  
order com  
LOWED

ALL CRANES  
NO MARBLE  
(201) 20 67



## **EXHIBIT H**







# **EXHIBIT I**





270.285

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ART 00062